

7/15/87

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7.15.87
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To: Ken Feigner ✓
Chuck Rice
Lee Caldwell

From: Marcia Bailly

Marcia -
Thanks -
A good meeting
A good package - Ken



This is your "information package" for the upcoming meeting with PWT/RBT (Tues., July 21, 10 a.m. - pre-meeting at 9:30 - 11th floor conference room).

Please note that our criticisms of the Closure Plan center around the following:

- 1) The efforts by PWT to delist the waste are described here and in addition are linked to their willingness and schedule for placing monitoring wells, against our specific direction to them. See p. 18, last paragraph, and Fig 4, p. 17.
- 2) The entire characterization effort to be accomplished is contained on pp 18 and 19, including all efforts to place a detection monitoring system pursuant to 265 Subpart and to comply with characterization requirements of 270.14(c). These efforts are deficient for many reasons, including those delineated in our letter of June 15, 1987, and in Florence Hoar's memo to Bob Farrell (who by the way will be at the meeting and who said he completely concurs with her remarks).
- 3) There are statements made that represent regulatory requirements incorrectly, in such a way as to make the work required seem significantly less than it actually is. See p. 18, first paragraph. Also page 7, second paragraph.

Note that the proposal calls for exactly four wells, and that they would not be located in the uppermost saturated zone, which, from Sweet-Edwards work, appears not to be continuous, but does appear to be monitorable.

A copy of the Consent Agreement and Final Order is included in the closure plan as Appendix A. The soil sampling plan to determine any release from the leachate collection system is not at issue here, and was approved by me verbally some months ago. The delisting plan, included in full here but ^{which} was not solicited, is also not at issue except as it is tied to the schedule for complying with the order.